

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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The JAY PETER KAUFMAN REVOCABLE :
TRUST, On Behalf of Itself and All Others :
Similarly Situated, :

Plaintiff, :

-against- : Case No. 07 CV 2902 SHS (FM)

NEW CENTURY FINANCIAL : Class Action
CORPORATION, BRAD A. MORRICE, :
ROBERT K. COLE, MARILYN A. :
ALEXANDER, HAROLD A. BLACK, :
FREDRIC J. FORSTER, EDWARD F. :
GOTSCHELL, DONALD E. LANGE, :
MICHAEL M. SACHS, RICHARD A. ZONA, :
PATTI M. DODGE, DAVID EINHORN, :
BEAR, STEARNS & CO., INC., MORGAN :
STANLEY & CO., INC., STIFEL NICOLAUS :
& COMPANY, INCORPORATED, and :
JEFFRIES & COMPANY, INC., :

Defendants. ----- X

PLEASE TAKE NOTICE that the above-captioned case is related to another case filed with this Court: *Jay Peter Kaufman Revocable Trust v. New Century Financial Corp., et al.*, 07-CV-2903 GBD (KNF) (filed April 10, 2007).

These cases are also related to the following securities cases filed in the Central District of California:

1. *Avi Gold v. Brad A. Morrice, et al.*, CV07-00931 DDP (JTLx) (February 8, 2007);
2. *Richard Damore, et al. v. New Century Financial Corp., et al.*, SACV07-00162 DDP (JTLx) (February 9, 2007);
3. *IRA for the Benefit of Kathleen M. Karchich v. New Century Financial Corp., et*

al., SACV07-00165 DDP (JTLx) (February 9, 2007);

4. *Abramcyk Real Estate Company, Inc. v. New Century Financial Corp., et al.*, SACV07-0170 DDP (JTLx) (February 9, 2007);

5. *Donald E. Meyer v. Brad A. Morrice, et al.*, CV07-00986 DDP (JTLx) (February 12, 2007);

6. *Robert W. Boyd III v. New Century Financial Corp., et al.*, SACV07-0173 DDP (JTLx) (February 12, 2007);

7. *Gerald Hammer v. New Century Financial Corp., et al.*, SACV07-0176 DDP (JTLx) (February 12, 2007);

8. *Paul Wood v. New Century Financial Corp., et al.*, SACV07-0182 DDP (JTLx) (February 13, 2007);

9. *Tom Benefield v. New Century Financial Corp., et al.*, CV-01103 DDP (JTLx) (February 16, 2007);

10. *Frank Mannella, IRA v. New Century Financial Corp., et al.*, SACV07-0214 DDP (JTLx);

11. *Parmanand Kumar v. Brad A. Morrice et al.*, 07-CV-00227 DDP (JTLx) (February 22, 2007);

12. *Peter J. Anton v. New Century Financial Corp. et al.*, CV 07-01260 DDP (JTLx) (February 28, 2007);

13. *Roy Brown, et al. v. New Century Financial Corp., et al.*, CV 07-01349 DDP (JTLx) (February 28, 2007);

14. *Stuart Wollman v. New Century Financial Corp., et al.*, SACV07-00251 DDP (JTLx) (March 2, 2007);

15. *Bruce Novotne v. New Century Financial Corp., et al.*, SACV07-270 DDP (JTLx) (March 6, 2007);

16. *Durston Winesburg v. New Century Financial Corp., et al.*, CV07-1683 DDP (JTLx) (March 13, 2007);

17. *Joe Verne v. New Century Financial Corp., et al.*, SA CV 07-320 JVS (ANx) (March 16, 2007);
18. *Donald Johnson v. Robert K. Cole, et al.*, SA CV 07-304 AG (RNBx) (March 15, 2007);
19. *Richard Simmons v. New Century Financial Corp., et al.*, SACV07-0311 DDP (JTLx) (March 16, 2007);
20. *Suo-Lun Huang v. Robert K. Cole, et al.*, SACV 07-0387 JVS (ANx) (April 4, 2007); and
21. *William Kornfeld, Jr. v. Robert K. Cole, et al.*, SACV07-391 AG (ANx) (April 5, 2007).

The California cases are in the process of being transferred to the Honorable Dean D. Pregerson for coordination and consolidation.

Defendants Brad A. Morrice, Robert K. Cole, Edward F. Gotschall, and Patti Dodge (“Defendants”) submit that the two securities cases pending in the Southern District of New York and all of the above-listed cases in the Central District of California are appropriate for coordination and consolidation because they “arise from the same or a closely related transaction, happening or event” involving New Century Financial Corporation’s accounting methodologies and financial statements giving rise to claims under the federal securities laws. Central District of California L.R. 83-1.3.1. All of these cases are governed by the Private Securities Litigation Reform Act of 1995 (“PSLRA”). They involve many of the same defendants. Litigating these cases in different courts would require a duplication of efforts that would thwart judicial efficiency, cause inconvenience to the parties and witnesses involved, and could potentially result in conflicting findings of liability. Coordination and consolidation of these cases would result in “a substantial saving of judicial resources” and would advance “the

just efficient and economical conduct of the litigations.” Southern District of New York Rule for the Division of Business Among District Judges 15. As such, Defendants intend to file motions pursuant to 28 U.S.C. § 1404(a) to transfer the present case and case number 07-CV-2903 GBD (KNF), both of which are currently pending in the Southern District of New York, to the Central District of California.

Several related derivative actions have also been filed. While these cases do not allege violations of the federal securities laws, they do allege harm as a result of essentially the same set of alleged events and statements made in 2006. Two of those derivative actions were filed in Central District of California and the remaining derivative actions have been filed in the California Superior Court, in the County of Orange.

Dated: April 25, 2007

Respectfully submitted,

COOLEY GODWARD KRONISH LLP

By: /s Shannon S. McKinnon
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Shannon S. McKinnon, under penalty of perjury, states:

I am an attorney at Cooley Godward Kronish LLP and a member of the Bar of the State of New York. I represent defendants Brad A. Morrice, Robert K. Cole, Edward F. Gotschall, and Patti M. Dodge in this matter.

On the 25th day of April 2007, I caused to be served a true copy of the Notice of Related Cases in the above-entitled action upon the following individuals by first class U.S. mail:

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